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April 22, 2025

Via ECF

Hon. Pamela K. Chen United States District Judge United States District Court, E.D.N.Y 225 Cadman Plaza East, Courtroom 4F Brooklyn, New York 11201

Re: <u>Juan Carlos Interiano, et al. v. Arch Specialty Insurance Company</u>

U.S.D.C., E.D.N.Y. Case No. 2:23-cv-238-PKC-AYS

Proposed Briefing Schedule for Plaintiff's Motion to Disqualify

Dear Judge Shields:

This firm represents Plaintiff, Juan Carlos Interiano ("Plaintiff") in the above-referenced matter. Plaintiff respectfully requests leave to file a motion to disqualify counsel for Defendant Arch Specialty Insurance Co. ("Arch") due to a conflict of interest.

The parties have met and conferred at length, both by written correspondence and telephonic conference, including a telephone conference with Magistrate Judge Sheilds on February 18, 2025. As the parties have been unable to resolve this issue in good faith, motion practice is necessary, and Magistrate Judge Shields has directed us to proceed with a motion in accordance with Your Honor's Individual Rules.

Counsel for the parties have conferred and have agreed to the following briefing schedule:

April 23, 2025: Plaintiff's Motion Papers Due

May 21, 2025: Defendant's Opposition Papers Due

June 2, 2025: Plaintiff's Reply Papers Due

If approved, the parties will electronically file their respective motion papers when the motion is fully briefed on May 30, 2025, or on such other date as this Court orders. Plaintiff requests oral argument on the motion.

Very truly yours,

Patrick L. Selvey

cc: All counsel of record (via ECF)